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***Via Electronic Filing  
and Courtesy Copy Via Facsimile***

Hon. Madeline Cox Arleo  
United States District Court for the District of New Jersey  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: *Illinois National Insurance Company v. Wyndham Worldwide Operations, Inc., et al.*, Case No. 2:09-cv-01724  
Our File No.: 02331-085411

Dear Magistrate Judge Arleo:

In their opposition brief of April 5, 2010, the Wyndham Defendants included a purported motion to quash certain portions of subpoenas served by plaintiff Illinois National Insurance Company ("Illinois National") on two non-parties, Avis Budget Group, Inc. and Realogy Corporation. The insertion of this purported motion regarding records subpoenas in an opposition brief, without any prior meet and confer on the issue<sup>1</sup>, and without any briefing schedule, is improper. The motion should not be considered.

Alternatively, if the Court is nonetheless inclined to address Wyndham's motion, Illinois National requests a full opportunity to respond.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew T. Houghton".

Andrew T. Houghton  
Sedgwick, Detert, Moran & Arnold LLP

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<sup>1</sup> The Wyndham Defendants state in their April 5 opposition at page 17 that "Initially, the return date on the subpoenas to ABG and Realogy was prior to the April 14, 2010 conference before Your Honor. After conferring with Sedgwick and reminding it of our request for a stay of discovery, it amended the return date on the subpoenas to April 16, 2010 – two days after the conference." This statement is in error. There has never been any communication regarding the subpoenas and the original subpoenas were returnable April 16, not prior. The subpoenas were amended due to an error in the address of the subpoenaed parties.